



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

August 29, 2003

In re Application of: Caldwell et. al
Serial No. 09/761,604
Filed: 01/16/01
For: NATURAL LANGUAGE PRODUCT COMPARISON GUIDE
SYNTHESIZER
Examiner: Alford W. Kindred
Art Unit: 2177
Attorney Docket No.: CO2.2

**DECLARATION OF PRIOR INVENTION IN THE UNITED STATES TO OVERCOME
CITED PATENT OR PUBLICATION (37 CFR 1.131)**

HONORABLE COMMISSIONER OF PATENTS AND TRADEMARKS
Washington, D.C. 20231

PURPOSE OF DECLARATION

This declaration is to establish completion of the invention in this application in the United States at a date prior to October 18, 2000, which is the effective date of Shaya, et.al, US Published Patent Application 2002/161,664, the prior art publication which was cited by the Examiner in his office action dated June 4, 2003. This declaration is being made by all of the inventors in the present application: David E. Caldwell, Michael White, and Tanya Korelsky.

FACTS AND DOCUMENTARY EVIDENCE

The undersigned inventors hereby declare as follows:

1. We are the inventors of the present invention, embodied in US Patent Application 09/761,604, filed January 16, 2001, and entitled "Natural Language Product Guide Synthesizer".
2. The invention claimed in the present application, as amended in the Office Action response filed with this declaration, was conceived and reduced to practice at least as early as August, 2000.
3. Attached to this declaration as "Exhibit A" are copies of screen displays ("screenshots") showing the method of the invention in use in a prototype form. The screenshots

represent computer displays created by a prototype system which was tested internally at Cogentex, Inc, the Assignee of the present application.

4. Specifically, these screenshots show:

- a. (Figure 1) A sample display from the prototype system, which displays over a computer network (via a web browser) a product comparison guide featuring dynamically generated fluent text that is used to convey product analyses and recommendations tailored to the user's requirements and preferences.
- b. (Figure 2) The text snippet database used to produce the display in Figure 1. The text snippets shown here function both as feature text snippets (referring to particular product features) and user profile text snippets (referring to particular user profiles).

5. Attached as "Exhibit B" is a screenshot showing file creation dates in August, 2000 for the computer files which created the screenshots listed in 4(a)-(b) above.

6. From these screenshots it can be seen that the invention in this application was reduced to practice at least by the date of August of 2000, which is an earlier date than that of the effective date of the reference.

7. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Michael W. White

Michael White
Date: August 28, 2003

Tanya Korelsky

Tanya Korelsky
Date: Aug. 27 '03

David E. Caldwell

David E. Caldwell
Date: Aug. 27 '03